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14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO DIVISION**

17 **IN RE: UBER TECHNOLOGIES, INC.,**
18 **PASSENGER SEXUAL ASSAULT**
19 **LITIGATION**

MDL No. 3:23-md-03084-CRB

Honorable Charles R. Breyer

20 **This Document Relates to:**

Case No.: 3:25-cv-00369

21 **JANE DOE NLG (B.H.),** an Individual,
22 *Plaintiff,*
23 vs.

DECLARATION OF STEVEN S.
SCHULTE IN SUPPORT OF NLG'S
MOTION TO WITHDRAW AS
COUNSEL OF RECORD FOR
PLAINTIFF B.H.

24 **UBER TECHNOLOGIES, INC.** a Delaware
25 Corporation;
26 **RASIER, LLC,** a Delaware Limited Liability
27 Company,
28 **RASIER-CA, LLC,** a Delaware Limited
Liability Company, and Does 1 through 50,
Inclusive, et al.
Defendants.

I, Steven S. Schulte, declare:

1. I am an attorney in the law firm of Nachawati Law Group ("NLG"). I am a member of the State Bar of Texas and am admitted to practice *pro hac vice* before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

1 2. Plaintiff B.H. has been non-responsive to my firm's numerous efforts to reach out and
2 have meaningful communications about the case.

3 3. Plaintiff B.H.'s failure to respond or otherwise meaningfully communicate with my
4 firm over months has presented a great difficulty to our firm's efforts at representation, including
5 meeting various discovery or informational requests and deadlines or otherwise prosecute the
6 case. It is my opinion that I and our firm's withdrawal from the case has become necessary.

7 4. My firm has taken all reasonably available steps to avoid prejudice to the interests and
8 rights of Plaintiff B.H.

9 a. Over the course of months, Plaintiff B.H. was sent or received numerous
10 letters, emails, text messages, and telephone calls requesting that Plaintiff contact our firm. These
11 communications emphasized the need to discuss aspects of the case or the necessary participation
12 in the case, and then more recently, our firm's need to withdraw as counsel of record in light of
13 non-responsiveness and lack of communication.

14 b. On August 15, 2025, my firm sent a final communication via fed ex to
15 Plaintiff stating our intention and need to seek to withdraw as counsel of record on Plaintiff's
16 behalf based upon repeated and unsuccessful efforts or attempts to communicate with Plaintiff.
17 This communication relayed to Plaintiff the option and need to seek alternative representation.

18 5. As of this date, Plaintiff B.H. has not responded or informed our firm that alternative
19 counsel has been retained.

20 6. Our firm's withdrawal from this case will not impact the timing or schedule of this
21 litigation; our firm has taken all reasonable steps possible to protect the interests and avoid any
22 prejudice to Plaintiff by informing her of her options and consequences of failing to respond or
23 otherwise comply with case progression or deadlines.

24 7. I understand that pursuant to Local Rule 11-5(b), leave to withdraw may be conditioned
25 on our firm continuing to accept papers to forward to the client. We are able to accept this
26 responsibility should the Court require.

27 Executed on August 26, 2025 in Dallas, Texas.

28 Dated: August 26, 2025

NACHAWATI LAW GROUP

/s./ Steven S. Schulte

Steven S. Schulte (TX SBN 24051306)

Admitted pro hac vice

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COUNSEL FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on August 26, 2025, I electronically filed the foregoing using the CM/ECF system which will serve notification of such filing to the email of all counsel of record in this action. I also certify that a copy of this document was sent by mail to Plaintiff B.H.

Furthermore, on August 26, 2025 I electronically filed the same document on Plaintiff B.H.'s individual docket, Case No. 3:25-cv-00369. The CM/ECF system served notice of such filing to the email of all counsel of record in this action. My law firm sent a copy of that filing by mail to Plaintiff B.H.

/s./ Steven S. Schulte